

# MEMO ENDORSE

## DONALDSON & CHILLIEST, LLP

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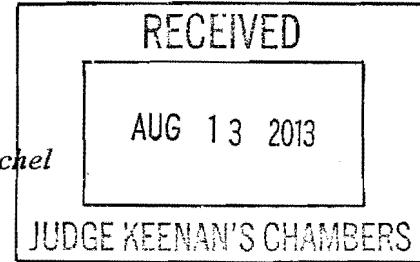
Ozro Thaddeus Wells  
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Of Counsel

August 8, 2013

Honorable John Keenan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *U.S. v. Angelo Michel*  
11 Cr 755 (JK)

Honorable Keenan,



Please be advised that Ms. Meusette Gonzalez is currently employed by my firm as our Legal Assistant. Ms. Gonzalez has been trained to conduct in depth legal interviews, organize files and perform research. It would be beneficial to our firm if the Court would appoint Ms. Gonzalez paralegal responsibilities for trial preparation purposes in the above-referenced multi-defendant large conspiracy case. Moreover, Ms. Gonzalez has been previously assigned such responsibilities by the Honorable Naomi R. Buchwald in the case of *U.S. v. Cibik* 11 Cr 424 (NRB) and by Honorable Paul A. Engelmayer in *U.S. v. Jose Mejia* 11 Cr 1032 (PAE).

Ms. Gonzalez is a recent John Jay College graduate with a B.A. in Criminal Justice. Prior to her employment with my firm, Ms. Gonzalez was employed by the New York State Attorney General's Office Consumer Fraud Bureau. There her duties consisted of informing the public of the most prevalent forms of consumer fraud being reported.

Furthermore, when it came time for the assistant attorney general in charge to initiate motions to begin trial, Ms. Gonzalez working in a team environment was responsible for the production of all documents necessary for litigation.

For all the aforementioned reasons, I firmly believe that Meusette Gonzalez should be appointed paralegal responsibilities for trial preparation purposes at a rate of \$35.00 per hour for a maximum of 100 hours.

Thank you kindly in advance for your consideration.

Sincerely,

Donaldson & Childest, LLP

Xavier R. Donaldson

Approved  
Granted  
March 14, 2013 John F. Keenan  
Ordered 26 D.J.

